

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|--|---|------------------------|
| RUTH SMITH, Individually and as Widow for the |) | |
| Use and Benefit of Herself and the Next Kin of |) | |
| Richard Smith, Deceased, |) | |
| |) | |
| Plaintiff, |) | Civil No. 3:05-0444 |
| |) | Judge Aleta A. Trauger |
| v. |) | (Dist. Of MA No. |
| |) | 1:05-cv-11515PBS) |
| PFIZER, INC., <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE
VARIOUS EVIDENCE, REFERENCES, AND ARGUMENTS**

Pursuant to Federal Rules of Evidence 401, 402, 403, 802, and 411, Defendants Pfizer Inc and Warner-Lambert Company LLC (collectively, "Defendants" or "Pfizer") respectfully move this Court for an order *in limine* excluding at trial various evidence, references, and arguments that are specifically described in the accompanying memorandum of law. The grounds for this motion are set forth in more detail in the accompanying memorandum of law.

WHEREFORE, Defendants respectfully request that this Court exclude from trial the specific items of evidence set forth in the accompanying memorandum of law.

Dated: April 16, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of April 2010, I electronically filed the foregoing document with the Clerk of the Court, United States District Court for the Middle District of Tennessee, using the CM/ECF system. True and correct copies of the foregoing documents are being served via the Court's CM/ECF system on the following:

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